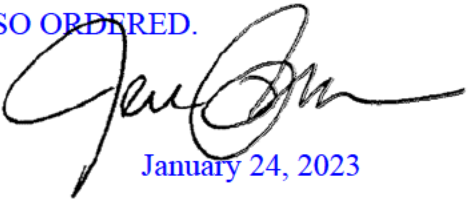


Application GRANTED. The Clerk of Court is directed to terminate ECF No. 160. SO ORDERED.

January 23, 2023

The Honorable Jesse M. Furman
United States District Judge for the Southern District of New York
Thurgood Marshall Courthouse
40 Centre Street, Room 2202
New York, NY 10007



January 24, 2023

Re: *Golden Unicorn Enters., Inc. v. Audible, Inc.*, 1:21-cv-7059-JMF

Your Honor:

The parties write to request the Court's approval of a procedure for moving to seal Audible, Inc.'s Memorandum of Law in Opposition to Plaintiffs' Motion for Class Certification ("Opposition Brief") and the supporting exhibits. Audible intends to file documents Plaintiffs designated as "confidential" or "highly confidential" pursuant to the parties' Protective Order (ECF No. 44) in support of its Opposition Brief. Audible is still preparing its Opposition Brief and does not have a final brief or set of documents it intends to file in support. On January 20, 2023, Audible notified Plaintiffs of its intention to file Plaintiffs' confidential and highly confidential documents, and the parties agreed on the below procedure. This procedure is similar to the one the Court approved for Plaintiffs' Memorandum of Law in Support of their Motion for Class Certification. See ECF Nos. 127, 136:

- **January 26, 2023:** Audible files its letter-motion to seal and files its Opposition Brief and all supporting documents under seal. Any portions Audible seeks redacted will be highlighted in yellow;
- **February 1, 2023:** Plaintiffs file any letter-motion to seal their documents and sends Audible any highlighted/redacted exhibits; and
- **February 2, 2023:** Audible files public and redacted versions of the documents that Audible and Plaintiffs do not move to keep under seal.

The parties respectfully request that the Court grant the parties' proposal given the number and complexity of the documents at issue and to allow Plaintiffs' sufficient time to review and justify their need to seal or redact any documents.

Respectfully Submitted,

/s/ Christopher Bagley

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